



September 29, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Promoting Innovation and Competition in the Provision of Multichannel Video Programming
Distribution Services (DN 14261)

Dear Ms. Dortch:

I am writing on behalf of Community Television of Santa Cruz County (CTV). For more than 15 years CTV has operated a vibrant media center and 3 PEG channels. We provide jobs, video production training and vital local programming in an area under-represented by the regional and national media. Our committed community volunteers and staff have created thousands of hours of informative television featuring local issues and events, local elections and high school sports as well as 4,500 hours per year of city and county government meetings.

We are concerned about the impact the proposed rulemaking (DN 14261) will have on our organization and our ability to provide Public, Educational and Government (PEG) Access services to our community. We strongly support the comments and reply comments of the City of San Antonio and of Anne Arundel County *et al.* in this proceeding.

We are particularly concerned about the rulemaking's proposal to classify over-the top (OTT) video services provided by cable franchise holders as something other than a "cable service." Such a designation would allow cable franchise holders to undercut their public interest obligations.

Without PEG fees, CTV would likely close its doors. This would draw a curtain in front of democracy for many who cannot get to public, government meetings in person and who depend on our telecasts and online archive to stay engaged in civic discourse. Valuable job training would be lost to college interns. No and low-cost production services would no longer be available to help non-profit organizations spread their messages. The community at large would lose a channel of important local information not available elsewhere. A viable bridge across the digital divide would be blocked along with a well-used path to creative self-expression. Many jobs would also be lost.

We ask the Commission not to diminish these vital PEG public interest requirements as it considers this proposed rulemaking.

Respectfully submitted.

Becca King Reed
Executive Director, Community Television of Santa Cruz County

Cc: Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly